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22 UNITED STATES DISTRICT COURT
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NORTHERN DISTRICT OF CALIFORNIA

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25 In Re CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

No.: M-07-5944 SC
MDL NO. 1917

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28 (caption continued)

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2 This Document Relates to:
3
4 ALL ACTIONS.

**ADDENDUM TO STIPULATED ORDER
REGARDING THE PRODUCTION OF
ELECTRONICALLY STORED
INFORMATION**

5 WHEREAS, Hitachi, Ltd., Hitachi Displays, Ltd., Hitachi Asia, Ltd., Hitachi America,
6 Ltd., and Hitachi Electronic Devices (USA), Inc. (collectively the “Hitachi Defendants”) have
7 informed the Indirect Purchaser Plaintiffs and Direct Purchaser Plaintiffs (jointly “Plaintiffs”) that
8 their vendor is incapable of producing four metadata fields identified in Exhibit A to the Stipulated
9 Protective Order regarding the Production of Electronically Stored Information (the “Stipulated
10 Order”) at Row 32 (CAL_START), ROW 34 (ATTENDEES/PARTICIPANTS), Row 41 (LAST
11 AUTHOR), and Row 46 (SENSITIVITY);

12 WHEREAS, the Hitachi Defendants further have informed Plaintiffs that to produce the
13 metadata identified in Exhibit A to the Stipulated Order at Row 47 (CONVERSATION_INDEX),
14 would be overly burdensome and costly;

15 WHEREAS, the Hitachi Defendants have requested, based on the foregoing, to be excused
16 from producing the five above-mentioned metadata fields; and

17 WHEREAS, Plaintiffs are willing to enter into this Addendum to the Stipulated Order
18 based on the verbal and written representations made by Counsel to the Hitachi Defendants and
19 the Hitachi Defendants’ electronic discovery vendor, Iron Mountain/Stratify.

20 NOW, THEREFORE,

21 1. Plaintiffs and the Hitachi Defendants agree that as to any document production by any
22 of the Hitachi Defendants that would be subject to the Stipulated Order, the Parties acknowledge
23 and agree that the Hitachi Defendants are not obligated to produce the five following metadata
24 fields:

25 a. CAL_START
26 b. ATTENDEES/PARTICIPANTS
27 c. LAST AUTHOR

1 d. SENSITIVITY

2 e. CONVERSATION_INDEX

3 2. If, following the entry of this Stipulation, the Hitachi Defendants acquire the capability
4 of processing and producing, without subjecting the Hitachi Defendants to undue burden or costs,
5 one or more of the above-listed metadata fields (*i.e.*, CAL_START,
6 ATTENDEES/PARTICIPANTS, LAST AUTHOR, SENSITIVITY, or CONVERSATION_
7 INDEX), the Hitachi Defendants agree to include such metadata field or fields in all future
8 document productions to Plaintiffs.

9 This Agreement shall continue in full force and effect until further order of the Special
10 Master or until this litigation is terminated by a final judgment.

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12 **IT IS SO STIPULATED.**

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1 Dated: November 8, 2010

/s/ Mario N. Alioto

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8 Dated: November 8, 2010

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24 Pursuant to General Order, § X-B, the filer attests that the concurrence in the filing of this
25 document has been obtained from each of the above signatories.